

Worksheet for Technical Review of Working Draft of Proposed Permit

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| Company Name: | Alon Refining Krotz Springs, Inc. | AI No.: | 3116 | TEMPO Activity No.: | PER20080013, |
| Facility Name: | Krotz Springs Refinery | Remarks Submitted by: | Anita Junker | | PER20080014 |
| Permit Writer: | Qingming Zhang | Permit Writer Email address: | qingming.zhang@la.gov | | |

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. “Specific Condition 120”, or “Section II Air Permits Briefing Sheet”, etc.).

Remarks – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information **must be submitted**. Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

DEQ Response – DO NOT COMPLETE THIS SECTION. This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during any required public comment period.

- Additional rows may be added as necessary.
- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.

| Permit Reference | Remarks | Air Permits Division Response (for official use only) |
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| SOB Page 1 Part II first paragraph | Typo only – desulfurization should be <u>desulfurization</u> | The typo has been corrected. Note that the Statement of Basis has been rewritten in new format. |
| SOB Page 1 last paragraph | Typo/clarification only - The company is currently operating under the Part 70 Operating Permit 2600-00003-V1 (<u>AA dated 4/1/08</u>); PSD-LA-140 (<u>Amendment dated 10/9/80</u>); PSD-LA-504(<u>M-1</u>) (<u>issued 4/22/90</u>). (Remaining permit references are correct.) | Amendment/modification dates have been added. |
| SOB Page 2 TAP Table | Adjust Cresol total for quantity missing from ARE001 (see later comment under Emission Rates) | Cresol emission rates have been updated in the proposed Part 70 operating permit. |
| SOB Page 4 LDAR Table Group 1 | Add GDU-45 to this grouping | Updated the fugitive group as requested. |
| SOB Page 4 LDAR Table Group 2 | Add LRU-30 to this grouping | Updated the fugitive group as requested. |
| SOB Page 4 LDAR Table Group 3 | Remove GDU Heater from this grouping since it is part of the GDU-45 unit included in Part 1 (above) | Updated the fugitive group as requested. |
| SOB Page 4 LDAR Table Group 4 | Add Crude Utilities-80 to this grouping | Updated the fugitive group as requested. |

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| SOB Page 5 GC XVII Activities | For clarification, KSR requests that the statements under this section be included in Section VIII of the Air Permit Briefing Sheet portion of the permit. | Heading of this section already indicates the listed activities are General Condition XVII activities. |
| SOB Page 5 IAs | For clarification, KSR requests that the statements under this section be included in Section IX of the Air Permit Briefing Sheet portion of the permit. | The citation for each listed activity in this section already indicates that the activity is an insignificant activity. |
| SOB Page 5 V-Permit Shield | This section states that no permit shield is granted. However, KSR requested several permit shields as required under AAE section 9 and explained further in the application text section IV.E. KSR requests incorporation of these permit shields into the specific conditions of the permit or a clarification as to why these shields are denied as part of the Statement of Basis. | Permit shield is for applicability determination and interpretations of very specific requirements of NSPS, PSD, NNSR, or MACT/NESHAP. The application does not request permit shield for such specific requirements. |
| PSD Permit - General | KSR commends LDEQ for the proposed PSD consolidation format, as this was a very complicated task. In order to clarify when future changes warrant a PSD modification, as well as to avoid any debate over potential conflicts with TV conditions, KSR also requests that the PSD-1.A-745 BACT determination summary table and specific conditions be incorporated into Title V air permit briefing sheet as a new section X. | See LAC 33:III.507.1, 40 CFR 70.6(f), and Louisiana Guidance for Air Permitting Actions Section 3.5 for more details on permit shield issues. |
| PSD Page 2 second to last paragraph | Typo only - Philbro Refining should be <u>Philbro</u> Refining | Currently, Title V permit and PSD permit are separate permits. |
| PSD Page 3 BACT table Tanks | The PSD permit requires best available control technology for tanks as NSPS Ka and Kb, but the Title V exempts some from associated controls due to low vapor pressure. For consistency with the Title V, KSR requests a clarification or specific condition in the PSD permit that confirms no controls are required if exempt due to vapor pressure or other cited exemption. | However, terms and conditions of the PSD permit have already been incorporated in the Specific Requirements section of the Title V permits. |
| PSD Page 3 BACT table Group 2 | Storage tanks subject to NSPS Subpart Ka should include tank 80-14. | The typo has been corrected. |
| PSD Page 3 BACT table FCCU Regenerator (1.85) | SO2 BACT: NSPS Subpart J – Per 40 CFR 60.100(c), KSR's FCCU Regenerator is currently not subject to NSPS Subpart J Standards for SOx. PSD LA 232, which permitted the FCCU, utilized a BACT comparable to the emission standard in 60.104(b)(2) (i.e., 20 lbs of SO2 per ton of coke burn off on a 7-day rolling average). To avoid a broader enforcement interpretation, KSR requests clarification that all SOx requirements of Subpart J are not applicable, only the emission standard of 20 lbs of SO2 per ton of coke burn off as a 7-day rolling average per 60.104(b)(2). | Tank 80-14 has been included in the table. |
| PSD Page 4 Public Notice | Historically the Department has noticed permitting actions in the local "Opelousas Daily World," as opposed to the "Lake Charles American Press". Due to proximity, KSR requests notification in the Opelousas paper. | LDEQ's Public Participation Group will decide which local news paper the public notice will be published in. |

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| PSD Page 5 Condition 1 | In an email dated May 4, 2009, KSR requested that the FCCU Charge Heater H-4201 emission rate be reversed to 0.160 lb/MMBtu. Since that time, KSR has determined that the originally requested lower limit of 0.120 lb/MMBtu is, in fact, correct. Please revise to the lower limit. | The NO _x emission limit for Heater H-4201 has been corrected from 0.160 lb/MM BTU to 0.120 lb/MM BTU. |
| PSD Page 5 Condition 2 | <p>(1) This condition references the attached "Use of Flue Gas Monitors for Combustion Controls". This attachment requires testing that was conducted as required when the original PSD permits were issued, and should not appear to be required subsequent to issuance of this permit modification. KSR requests that condition 2 be revised to clarify that the specified monitors have been installed, testing has been completed, and ranges have been set.</p> <p>(2) The attachment, "Use of Flue Gas Monitors for Combustion Controls", references General Condition VIII, which is not clarified elsewhere in the PSD permit. KSR requests that this reference be removed or else LAC 33:III.537 be cited relative to GC VIII.</p> <p>(3) In the modification application text, KSR requested specific language referencing LDEQ historical correspondence that the oxygen parameters do not apply when operating at less than normal firing rates. Please add language to condition 2 that states: "The specified O₂ range shall not apply during periods when the unit is being operated at less than the normal firing rate, including periods of startup, shutdown, and low fire hold."</p> | <p>(1) The attachment specifies the methods and procedures for the establishment of operating parameter ranges and recordkeeping requirements. The methods and procedures shall be followed whenever it is needed to reestablish the operating parameter ranges due to any combustion equipment modifications, etc.</p> <p>(2) Citation LAC 33:III.527 is added in this attachment as requested.</p> <p>(3) Such exceptions can be specified as part of O₂ limits. (O₂ limits are not included in this specific condition.)</p> |
| PSD Page 5 Condition 5 | KSR's FCCU Regenerator is currently not subject to NSPS Subpart J Standards for SO _x . PSD LA-232, which permitted the FCCU, utilized a BACT comparable to the emission standard in 60.104(b)(2) (i.e., 20 lbs of SO ₂ per ton of coke burn off on a 7-day rolling average). To avoid a broader enforcement interpretation, KSR requests clarification that all SO _x requirements of Subpart J are not applicable, only the emission standard of 20 lbs of SO ₂ per ton of coke burn off as a 7-day rolling average per 60.104(b)(2). | By NSPS regulation, the FCCU Regenerator is not subject to NSPS Subpart J standards for SO ₂ . However, it is PSD BACT determination for this source to comply with all provisions of 40 CFR 60 Subpart J, as such provisions relate SO ₂ emissions, by June 30, 2010. The requirements include those specified in 40 CFR 60.104(c). |
| TV Briefing Sheet Section VI Public Notice | Historically the Department has noticed permitting actions in the local "Opelousas Daily World," as opposed to the "Lake Charles American Press". Due to proximity, KSR requests notification in the Opelousas paper. | LDEQ's Public Participation Group will decide which local news paper the public notice will be published in. |
| TV Briefing Sheet Section VIII GC17 Activities | Temporary use engine emissions identified in the August 7, 2009 additional information transmittal have been left off (last line item in august transmittal). KSR requests this GC 17 Activity and associated emissions be included, or LDEQ otherwise confirm it is exempt from permitting. | The temporary engines identified in the August 7, 2009 additional information transmittal are not qualified as GC XVII activities due to high NO _x (20.62 TPY) and CO (9.74 TPY) emissions. |

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| TV Briefing Sheet Section IX.1A\` | <p>Insignificant activities have been reviewed for correct classifications and other updates. The following adjustments are suggested:</p> <ul style="list-style-type: none"> • 99TK853 - Caustic Day Tank (1050 gal.) - LAC:III.501.B.5.A.3 was inadvertently omitted and should be added to the IA list. • 42TK340 - DEA Surge Tank (14994 gal.) - LAC:III.501.B.5.A.3 was inadvertently omitted and should be added to the IA list. • The following ID numbers should be changed: TK-798 to 79TK798; DK-3 to 90TK911; DK-4 to 90TK912; IA-6 to 90TK913; IA-31 to 90TK914 • The following tanks are now believed to be regulated under 40 CFR 63 Subpart EEEE: 23TK234; 23TK235; 42TK421; 42TK422; 42TK420 • Tank 90TK903 is now regulated under 40 CFR 63 GGGG • The following units are part of the refinery wastewater system area source (ARE001): 99TK850; TK-9909; 35TK706; 42TK342; 99TK855; 99TK858; 99TK872; 99TK996; 99TK999; 35TK706; 99TK995 • Tank ??82TK821?? should cite LAC 33:III.501.D. • Typo – Last item “Rrac Tanks” should be Frac Tks | <ul style="list-style-type: none"> • Tank 99TK853 has been added to Insignificant Activities (IA) list as requested. • Tank 42TK340 does not qualify as an IA under LAC 33:III.B.5.A.3 due to its size (14,994 gal.) and is not added in the IA list. • Updated ID for Tanks 79TK798, 90TK911, 90TK912, 90TK913, and 90TK914 as requested. • Krotz Springs Refinery is an affected source under 40 CFR 63 Subpart CC. Tanks associated with operations of this facility are excluded from the affected source under 40 CFR 63 Subpart EEEE per 40 CFR 63.233(c). • Tank 90TK903 has been removed from the IA list as requested. It is permitted as part of site remediation activities. • Tanks permitted as part of the wastewater system are removed from the IA list as requested. • Citation for Tank 82TK821 has been changed to LAC 33:III.501.D as requested. • Typo, ‘Rrac Tanks’, has been corrected. |
| TV Section X Table 1 – Requirements Matrix EQT 0084 | <p>In the modification application text, KSR requested that Tank 25-2 (EPN 16-85) be categorized as an Insignificant Activity under LAC 33:III.501.B.5.D, and LDEQ included it as such under the draft permit Section IX. Please remove as an individual source.</p> | <p>Tank 25-2 has been determined as an IA and was removed from emission point list.</p> |

| Permit Reference | Remarks | Air Permits Division Response (for official use only) | | |
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| TV Section X Table 1 - Requirements Matrix | KSR identified the following tanks as subject to 40 CFR 63 Subpart EEEE (notification and recordkeeping requirements only), but LDEQ has not included any EEEE tank requirements in the permit. KSR interpreted that these tanks would fall under EEEE standards because they potentially contain organic liquids and do not qualify as storage vessels under subpart CC due to size (<40 m3). KSR requests confirmation as to whether EEEE is applicable, or otherwise requests clarification in the form of exemption from EEEE in Table 2. | These tanks are part of the Krotz Springs Refinery, which is an affected source under 40 CFR 63 Subpart CC. Therefore, they are excluded from the affected source under 40 CFR 63 Subpart EEEE per 40 CFR 63.2338(c). | | |
| TV Section XI Table 2 - Exemptions Group 3 | <p>KSR requests documentation in the permit that these boilers are also exempt from Da, Db, and Dc</p> <p>As indicated in the permit, boilers in this group should be regulated under NSPS Subpart D. Thus, they are not affected source under NSPS Da, Db, and Dc. Further explanation of exemption is not necessary.</p> | | | |
| TV Section XI Table 2 - Exemptions Group 4 | <p>KSR requests documentation in the permit that this boiler is also exempt from D, Da, and Dc</p> <p>As indicated in the permit, boilers in this group should be regulated under NSPS Subpart Db. Thus, they are not affected source under NSPS D, Da, and Dc. Further explanation of exemption is not necessary.</p> | | | |
| TV Section XI Table 2 - Exemptions Group 13 | <p>KSR requests documentation in the permit that these boilers are also exempt from D, Da, and Db</p> <p>As indicated in the permit, boilers in this group should be regulated under NSPS Subpart Dc. Thus, they are not affected source under NSPS D, Da, and Db. Further explanation of exemption is not necessary.</p> | | | |
| TV Section XI Table 2 - Exemptions Group 16 | <p>Delete – this dock loads gasoline and vents through EQT089</p> <p>According to the application, EQT0118 is for diesel loading operations at this dock.</p> | | | |
| TV Section XI Table 2 - Exemptions Group 23 | | | | |

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| Inventory Table Operating Rates | In the modification application text, KSR requested a clarification relative to the intent of LA General Condition III as it relates to the Inventory Table. KSR requested the following clarification be added to the permit to confirm the intent of LA GC III: "Information included in the Inventories section of the permit, including operating rates and operating time, are not enforceable limitations (applicable requirements) unless they are included in the Specific Requirements." | |
| Inventory Table Contents | In the modification application text, KSR requested removal of specified tank service in the permit. A single material is listed under "Contents" relative to the permitted storage tanks in the Inventories section. KSR requests that the tank service for each tank be removed since tank service may change based on operational needs and the tanks will all be included in a Tanks CAP to facilitate this operational flexibility. | Regulatory applicability for a tank is related to the "contents" stored in the tank. Therefore, the "contents" shall remain in the Inventories section. KSR can request service of more than one material for a tank. |
| Inventory Table EQT049 | Typo – should be Tank 80-5 | The typo has been corrected. |
| Inventory Table EQT 0062, 0063, 0086, 0088, 0089, 0098 | Operating Time should be 8760 hours/year. | Operating time has been updated as requested. |
| Inventory Table EQT 0062, 0063 | Max operating rate should be 4000 bbls/hr and normal operating rate should be deleted. | Operating rates have been updated as requested. |
| Inventory Table EQT066 | Typo – should be Tank 55-10 | The typo has been corrected. |
| Inventory Table EQT 0076 | Normal operating rate should be 43.8 MM BTu/hr per the calculations. | The emission calculations for EQT0076 are based on 158.6 MM BTU/hr. not 43.8 MM BTU/hr. |
| Inventory Table EQI084 | In the modification application text, KSR requested that Tank 25-2 be categorized as an Insignificant Activity under LAC 33:II.501.B.5.D. and LDEQ included it as such under the draft permit Section IX. Please remove as an individual source. | Tank 25-2 has been determined as an IA and was removed from emission point list. |
| Inventory Table EQT 0086 | Max operating rate should be 3500 bbls/hr and normal operating rate should be deleted. | Operating rates have been updated as requested. |
| Inventory Table EQT 0087 | Normal operating rate should be 158.6 MMBtu/hr per the calculations. | The emission calculations for EQT0087 are based on 43.8 MM BTU/hr. not 158.6 MM BTU/hr. |
| Inventory Table EQT 0088 | Normal operating rate should be 2565 gallons/min. | Operating rate has been updated as requested. |
| Inventory Table EQI102 | Typo – should be C4/C5 Loading | EQI and calculation section in the application indicate that this point is for C5 Loading. |
| Inventory Table EQT 0108 | Max operating rate should be 112.5 MMBTU/hr | The maximum operating rate has been updated as requested. |
| Inventory Table EQT 0112 | Max operating rate should be 1667 scf/min | The maximum operating rate has been updated as requested. |

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| Inventory Table EQT 16 | Because site remediation is an activity, KSR suggests this group of equipment be listed as an area source. | Changed the category for the site remediation activities to the "area" in TEMPO as requested. | | | | | | | | | | | | | | | |
| Inventory Table Stack Information EQT 0071 | Exit temperature should be 1700 F. | The exit temperature has been updated as requested. | | | | | | | | | | | | | | | |
| Inventory Table EQT numbers | The following tanks should be added to the table and subject to 40 CFR 63 Subpart EEEE if not exempt per comments above. EIQ Sheets are attached to these comments to facilitate addition to the table. | These tanks are part of the Krotz Springs Refinery, which is an affected source under 40 CFR 63 Subpart CC. Therefore, they are excluded from the affected source under 40 CFR 63 Subpart EEEE per 40 CFR 63.2338(c). | | | | | | | | | | | | | | | |
| | <table border="1"> <thead> <tr> <th>Tank No.</th> <th>EQT</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>234</td> <td>EQT0141*</td> <td>Crude O/H Filter</td> </tr> <tr> <td>235</td> <td>EQT0142*</td> <td>Crude Desalter Emulsion Breaker</td> </tr> <tr> <td>421</td> <td>EQT0143*</td> <td>LCO Color Stabilizer Tank</td> </tr> <tr> <td>422</td> <td>EQT0144*</td> <td>Desalter Emulsion Tank</td> </tr> </tbody> </table> <p>* proposed EQT number</p> | Tank No. | EQT | Description | 234 | EQT0141* | Crude O/H Filter | 235 | EQT0142* | Crude Desalter Emulsion Breaker | 421 | EQT0143* | LCO Color Stabilizer Tank | 422 | EQT0144* | Desalter Emulsion Tank | These small tanks have been listed in IA list as requested in the application. |
| Tank No. | EQT | Description | | | | | | | | | | | | | | | |
| 234 | EQT0141* | Crude O/H Filter | | | | | | | | | | | | | | | |
| 235 | EQT0142* | Crude Desalter Emulsion Breaker | | | | | | | | | | | | | | | |
| 421 | EQT0143* | LCO Color Stabilizer Tank | | | | | | | | | | | | | | | |
| 422 | EQT0144* | Desalter Emulsion Tank | | | | | | | | | | | | | | | |
| Inventory Table RLP Numbers | In the modification application text, KSR requested removal of "RLP" process equipment from the Inventory Table, since these components are all processing equipment internal to the production process with no atmospheric vents. This list is only a partial list of such equipment, and all but one route to other processing equipment rather than the flare. Venting to the flare, if it occurs, is only intermittent through pressure relief devices or when required for startup, shutdown, malfunction, or maintenance. These items should be deleted. | The internal processing equipment has been deleted from the emission point list. | | | | | | | | | | | | | | | |
| Inventory Table Fee Multiplier | The fee multiplier of 78 M bbls/day should be revised to 85 M bbls/day to be consistent with the AAE and correct refinery processing rate. | The fee multiplier has been updated. | | | | | | | | | | | | | | | |
| Inventory Table SIC Codes | Facility is a petroleum refinery – delete sewerage systems | This is not an air permit entry in TEMPO and has been deleted as requested. | | | | | | | | | | | | | | | |
| Emission Rates ARE001 | Add Cresol @ 0.03 ppm avg/0.04 ppm max/0.12 tpy max | Emissions rates of cresol have been added to ARE001. | | | | | | | | | | | | | | | |
| Emission Rates EQT 0062 | Max lb/hr for Xylene should be 0.07 | The maximum hourly rate of xylene has been updated as requested. | | | | | | | | | | | | | | | |
| Emission Rates EQT 0071 | TPY for Cobalt should be 0.005 | The annual rate of cobalt has been updated as requested. | | | | | | | | | | | | | | | |
| Emission Rates EQT 0076 | Max lb/hr for Acrolein should be 0.003 | The maximum hourly rate of acrolein has been updated as requested. | | | | | | | | | | | | | | | |
| ARE0001 SC 28 | Revise to include all wastewater tanks: Tanks 25-1, 5-1, 80-14, 8-1, 850, 851, 852, 856A, 856B, 857, 858, 859, 860, 861, 862, 872, 9909, 995, 996, and 999 | The specific requirement has been revised to include all wastewater tanks as requested. | | | | | | | | | | | | | | | |
| CRG0004 SC 64 | The PSD permit requires that these tanks comply with NSPS Ka instead of K. For simplicity, these tanks can also be grouped in with CRG0003. | The PSD BACT determination table has been revised to indicate that BACT is NSPS Subpart K for the affected tanks in CRG0004. | | | | | | | | | | | | | | | |

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| CRG0007 SC 92 | <p>The PSD permit requires best available control technology for these tanks as NSPS Kb, but the Title V exempts them from Kb controls due to low vapor pressure. KSR requests a clarification in both permits that confirms no Kb controls are required if exempt due to vapor pressure.</p> | <p>BACT determination table has been revised to indicate that no control is required for the affected tanks in CRG0007 with low total vapor pressure (< 0.5 psia).</p> |
| EQT0030 SC 145 thru 152 | <p>For simplicity, this boiler can be grouped in with CRG0002.</p> | <p>Requirements for EQT0030 are not identical to those in CRG0002.</p> |
| EQT0031 | <p>In the modification application text, KSR requested the following specific language to be included as clarification of requirements per the Consent Decree: "...The Crude Unit Flare (EPN 8-78) shall comply with 40 CFR Part 60 Subpart J by December 31, 2011."</p> | <p>Per approval by EPA, the following condition has been added for complying with NSPS Subpart J:</p> |
| EQT0036 SC 179 | <p>The PSD permit requires that this tank comply with NSPS Ka instead of K. This tank belongs in a control requirements group with EQT009.</p> | <p>As approved by EPA on April 7, 2009, this flaring device shall comply with NSPS Subpart J by eliminating to the extent practicable routes of continuous or intermittent, routinely-generated fuel gases, by monitoring this flaring device by use of a CEMS and a flow meter to demonstrate that this flaring device emits less than 500 pounds per day of SO₂ under normal conditions by December 31, 2011.</p> |
| EQT0071 SC 195 and 212 | <p>KSR's FCCU Regenerator is currently not subject to NSPS Subpart J Standards for SOx. PSD LA-232 which permitted the FCCU utilized a BACT comparable to 60.104(b)(2) (i.e., 20 lbs of SO₂ per ton of coke burn off on a 7-day rolling average). To avoid a broader enforcement interpretation, KSR requests clarification that all SOx requirements of Subpart J are not applicable, only the emission standard of 20 lbs of SO₂ per ton of coke burn off as a 7-day rolling average per 60.104(b)(2). "KSR shall comply with all requirements of 40 CFR Part 60 Subpart A and J, as such provisions relate to SO₂ emissions from the FCCU (I-85) regenerator, by June 30, 2010."</p> | <p>By NSPS regulation, the FCCU Regenerator is not subject to NSPS Subpart J standards for SO₂. However, it is PSD BACT determination for this source to comply with all provisions of 40 CFR 60 Subpart J, as such provisions relate SO₂ emissions, by June 30, 2010.</p> |
| EQT0071 SC209 | <p>In the modification application text, KSR requested that additional reporting such as this condition be streamlined. In essence, all conditions requiring March 31 reporting of emissions, times, throughputs, and similar records would be compliant with the permit unless otherwise described in the Title V Monitoring, Deviation, and Compliance Certification reports required semiannually and annually. KSR requests that this language be revised to the following in order to consolidate with those reports: "...A report of any deviations from the requirements of this condition shall be included in the Annual Compliance Certification and Deviation Report required by March 31 of each year."</p> | <p>The PSD condition has been included as a specific requirement.</p> |
| | | <p>Annual Compliance Certification and Deviation Report shall include all deviations from permit conditions. It's not necessary to add the proposed language to the condition for reporting such deviations.</p> |

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| EQT0072 SC214 | In the modification application text, KSR requested that additional reporting such as this condition be streamlined. In essence, all conditions requiring March 31 reporting of emissions, times, throughputs, and similar records would be compliant with the permit unless otherwise described in the Title V Monitoring, Deviation, and Compliance Certification reports required semiannually and annually. KSR requests that this language be revised to the following in order to consolidate with those reports: "A report of any deviations from the requirements of this condition shall be included in the Annual Compliance Certification and Deviation Report required by March 31 of each year." | Annual Compliance Certification and Deviation Report shall include all deviations from permit conditions. It's not necessary to add the proposed language to the condition for reporting such deviations. |
| EQT0072 SC 215 | KSR's ATS Unit is not subject to NSPS Subpart J Standards for SOx, only the emission limit of 250 ppm. KSR requests clarification that only the emission limit is applicable, and not all other SOx requirements of Subpart J. | By NSPS regulation, the ATS Unit is not subject to NSPS Subpart J standards for SO ₂ . However, it is PSD BACT determination for this source to comply with SO ₂ emission limit of 40 CFR 60 Subpart J for Claus sulfur recovery plant. |
| EQT 0073 SC 225 | In an email dated May 4, 2009, KSR requested that the FCCU Charge Heater H-4201 emission rate be reversed to 0.160 lb/MMBtu. Since that time, KSR has determined that the originally requested lower limit of 0.120 lb/MMBtu is, in fact, correct. Please revise to the lower limit. With this change, this heater can be combined into CRG0002. | The emission rate has been corrected as requested. |
| EQT0074 | In the modification application text, KSR requested the following specific language to be included as clarification of requirements per the Consent Decree: "The FCC Unit Flare (EPN 5-85) shall comply with 40 CFR Part 60 Subpart J by December 31, 2011." | Per approval by EPA, the following condition has been added for complying with NSPS Subpart J: As approved by EPA on April 7, 2009, this flaring device shall comply with NSPS Subpart J by eliminating to the extent practicable routes of continuous or intermittent, routinely-generated fuel gases, by monitoring this flaring device by use of a CEMS and a flow meter to demonstrate that this flaring device emits less than 500 pounds per day of SO ₂ under normal conditions by December 31, 2011. |
| EQT 0084 SC 252 | In the modification application text, KSR requested that Tank 25-2 (EPN 16-85) be categorized as an Insignificant Activity under LAC 33.III.501.B.5.D, and LDEQ included it as such under the draft permit Section IX. Please remove as an individual source. | Tank 25-2 has been determined as an IA and was removed from emission point list. |
| EQT 0093 SC 276 thru 281 | For simplicity, this heater can be combined in to CRG 0013. | Requirements for EQT0093 are not identical to those in CRG0013. |
| EQT 0099 SC 282 thru 293 | For simplicity, this tank and EQT 0036 can be combined into a single control requirements group with the conditions identified for EQT 0099. | Requirements for EQT0099 are not identical to those for EQT0036. |
| EQT 0103 SC 294 thru 296 | See comments above on EEEE tanks. | See the responses above to the related comments. |
| EQT 0105 SC 297 | For simplicity, this tank can be combined in to CRG 0007. | EQT0105 has been included in CRG0007 as requested. |
| EQT 0116 SC 307 thru 332 | Because site remediation is an activity, KSR suggests this group of equipment be listed as an area source. | EQT0116 has been changed to ARE0005. |

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| EQT 0118 SC 333 | Delete – this dock loads gasoline and vents through EQT089 | According to the application, EQT0118 is for diesel loading operations at this dock. |
| FUG 0002 SC 355 | <p>In the modification application text, KSR requested an alternative to connector monitoring requirements specified in the LA Refinery MACT, as was previously approved by LDEQ with the 1995 Consolidated Air Toxics Certification of Compliance and Compliance Plan, and has been followed since. In accordance with this approval, the language of the last sentence of this specific condition should be changed to read: "A connector that is associated with a valve and is determined to be leaking shall result in the connector being recorded and addressed as a leaking connector."</p> | <p>The language has been revised to indicate that a leaking connector that is associated with a valve shall be addressed as a "leaking connector" rather than a "leaking valve".</p> |
| FUG 0002 | <p>The Title V clarifies components that comprise Parts 2 thru 4 of the Fugitives program in those sections of the permit. KSR requests that FUG 0002 (Part 1) have a condition added to clarify that this part applies to the MTBE, Isom and GDU areas.</p> | <p>The condition as mentioned is already in the permit. The fugitive areas for this part has been updated as requested.</p> |
| FUG 0006 SC 361 | <p>In the modification application text, KSR requested an alternative to connector monitoring requirements specified in the LA Refinery MACT, as was previously approved by LDEQ with the 1995 Consolidated Air Toxics Certification of Compliance and Compliance Plan, and has been followed since. In accordance with this approval, the language of the last sentence of this specific condition should be changed to read: "A connector that is associated with a valve and is determined to be leaking shall result in the connector being recorded and addressed as a leaking connector."</p> | <p>The language has been revised to indicate that a leaking connector that is associated with a valve shall be addressed as a "leaking connector" rather than a "leaking valve".</p> |
| FUG 0006 SC 362 | Add LRU to this grouping | The fugitive areas for this part has been updated as requested. |
| FUG 0007 SC 386 | <p>Per the pending Title V appeal, KSR requests that the Department revise Specific Requirement No. 386 to reference the Consolidated Air Toxic Certification of Compliance and Compliance Plan which requires that reports be submitted semiannually, not quarterly.</p> | <p>Per Louisiana Fugitive Emission Program Consolidation Guidelines, the reporting frequency will be semiannual regardless of the overall most stringent program. Therefore, this specific requirement has been revised as requested.</p> |
| FUG 0007 SC 365 | Remove GDU Heater from this grouping since it is part of the GDU-45 unit included in Part 1. | The fugitive areas for this part has been updated as requested. |
| FUG 0007 SC 366 | <p>In the modification application text, KSR requested an alternative to connector monitoring requirements specified in the LA Refinery MACT, as was previously approved by LDEQ with the 1995 Consolidated Air Toxics Certification of Compliance and Compliance Plan, and has been followed since. In accordance with this approval, the language of the last sentence of this specific condition should be changed to read: "A connector that is associated with a valve and is determined to be leaking shall result in the connector being recorded and addressed as a leaking connector."</p> | <p>The language has been revised to indicate that a leaking connector that is associated with a valve shall be addressed as a "leaking connector" rather than a "leaking valve".</p> |

| Permit Reference | Remarks | Air Permits Division Response (for official use only) |
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| FUG 0008 SC 449 | <p>In the modification application text, KSR requested an alternative to connector monitoring requirements specified in the LA Refinery MACT, as was previously approved by LDEQ with the 1995 Consolidated Air Toxics Certification of Compliance and Compliance Plan, and has been followed since. In accordance with this approval, the language of the last sentence of this specific condition should be changed to read: "A connector that is associated with a valve and is determined to be leaking shall result in the connector being recorded and addressed as a leaking connector."</p> <p>Add Crude Utilities to this grouping.</p> | <p>The language has been revised to indicate that a leaking connector that is associated with a valve shall be addressed as a "leaking connector" rather than a "leaking valve".</p> <p>The fugitive areas for this part has been updated as requested.</p> |
| FUG 0008 SC 450 GRP 0005 SC 451 thru 453 | <p>In the modification application text, KSR requested removal of "RLP" process equipment from the Inventory Table, since these components are all processing equipment internal to the production process with no atmospheric vents. This list is only a partial list of such equipment, and all but one route to other processing equipment rather than the flare. Venting to the flare, if it occurs, is only intermittent through pressure relief devices or when required for startup, shutdown, malfunction, or maintenance. This group should be deleted.</p> | <p>The internal processing equipment has been deleted from the emission point list.</p> <p>(1) The enforceable limits for the cap are already included in the specific requirement. (2) Annual Compliance Certification and Deviation Report shall include all deviations from permit conditions. It's not necessary to add the proposed language to the condition for reporting such deviations.</p> |
| GRP 0007 Specific Requirement 455 | <p>(1) KSR intended for the requested caps to include speciated emissions as described in the EIQ sheets and included in the TV Emission Rates Table for TAP/HAPS and Other Pollutants. This will allow for operational flexibility necessitated by varying refinery crude feedstock and product outputs without interpreting a change in specification as a deviation from the permit. KSR therefore requests adding the following language at the beginning of this specific requirement: "Emission limitations associated with this cap are those identified in both Emission Rate Tables (Criteria Pollutants and TAP/HAP & Other Pollutants)."</p> <p>(2) In the modification application text, KSR requested that additional reporting such as this condition be streamlined. In essence, all conditions requiring March 31 reporting of emissions, times, throughputs, and similar records would be compliant with the permit unless otherwise described in the Title V Monitoring, Deviation, and Compliance Certification reports required semiannually and annually. KSR requests that this language be revised to the following in order to consolidate with those reports:</p> <p>"A report of any deviations from the requirements of this condition shall be included in the Annual Compliance Certification and Deviation Report required by March 31 of each year."</p> | |

| Permit Reference | Remarks | Air Permits Division Response (for official use only) | | | | | | | | | | | | | | | |
|-----------------------------------|---|--|-----|-------------|-----|----------|------------------|-----|----------|---------------------------------|-----|----------|---------------------------|-----|----------|------------------------|--|
| GRP 0008 Specific Requirement 456 | <p>(1) KSR intended for the requested caps to include speciated emissions as described in the EIQ sheets and included in the TV Emission Rates Table for TAP/HAPS and Other Pollutants. This will allow for operational flexibility necessitated by varying refinery crude feedstock and product outputs without interpreting a change in speciation as a deviation from the permit. KSR therefore requests adding the following language at the beginning of this specific requirement: "Emission limitations associated with this cap are those identified in both Emission Rate Tables (Criteria Pollutants and TAP/HAP & Other Pollutants)."</p> <p>(2) In the modification application text, KSR requested that additional reporting such as this condition be streamlined. In essence, all conditions requiring March 31 reporting of emissions, times, throughputs, and similar records would be compliant with the permit unless otherwise described in the Title V Monitoring, Deviation, and Compliance Certification reports required semiannually and annually. KSR requests that this language be revised to the following in order to consolidate with those reports: "A report of any deviations from the requirements of this condition shall be included in the Annual Compliance Certification and Deviation Report required by March 31 of each year."</p> | <p>(1) The enforceable limits for the cap are already included in the specific requirement.</p> <p>(2) Annual Compliance Certification and Deviation Report shall include all deviations from permit conditions. It's not necessary to add the proposed language to the condition for reporting such deviations.</p> | | | | | | | | | | | | | | | |
| GRP 0008 EQT 0084 | <p>This tank is an insignificant activity and does not store VOCs. It is not included in the Tank Cap.</p> <p>The following tanks should be added to the equipment list for the GRP0008. The emissions from these sources are included in the numbers listed for the group, but these sources are not listed as being part of this group.</p> <table border="1" data-bbox="595 422 775 1193"> <thead> <tr> <th data-bbox="595 422 660 475">Tank No.</th> <th data-bbox="595 475 660 528">EQT</th> <th data-bbox="595 528 775 580">Description</th> </tr> </thead> <tbody> <tr> <td data-bbox="595 580 660 633">234</td> <td data-bbox="595 633 660 686">EQT0141*</td> <td data-bbox="595 686 775 739">Crude O/H Filmer</td> </tr> <tr> <td data-bbox="595 739 660 792">235</td> <td data-bbox="595 792 660 844">EQT0142*</td> <td data-bbox="595 844 775 897">Crude Desalter Emulsion Breaker</td> </tr> <tr> <td data-bbox="595 897 660 950">421</td> <td data-bbox="595 950 660 1003">EQT0143*</td> <td data-bbox="595 1003 775 1056">LCO Color Stabilizer Tank</td> </tr> <tr> <td data-bbox="595 1056 660 1108">422</td> <td data-bbox="595 1108 660 1161">EQT0144*</td> <td data-bbox="595 1161 775 1214">Desalter Emulsion Tank</td> </tr> </tbody> </table> <p>*proposed EQT number</p> | Tank No. | EQT | Description | 234 | EQT0141* | Crude O/H Filmer | 235 | EQT0142* | Crude Desalter Emulsion Breaker | 421 | EQT0143* | LCO Color Stabilizer Tank | 422 | EQT0144* | Desalter Emulsion Tank | <p>Tank 25-2 (EQT0084) has been determined as an 1A and was removed from both emission point list and GRP0008.</p> <p>As requested in the application, these tanks are determined as 1A.</p> |
| Tank No. | EQT | Description | | | | | | | | | | | | | | | |
| 234 | EQT0141* | Crude O/H Filmer | | | | | | | | | | | | | | | |
| 235 | EQT0142* | Crude Desalter Emulsion Breaker | | | | | | | | | | | | | | | |
| 421 | EQT0143* | LCO Color Stabilizer Tank | | | | | | | | | | | | | | | |
| 422 | EQT0144* | Desalter Emulsion Tank | | | | | | | | | | | | | | | |

| Permit Reference | Remarks | Air Permits Division Response (for official use only) |
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| GRP 0009 | <p>(1) KSR Intended for the requested caps to include speciated emissions as described in the EIO sheets and included in the TV Emission Rates Table for TAP/HAPS and Other Pollutants. This will allow for operational flexibility necessitated by varying refinery crude feedstock and product outputs without interpreting a change in speciation as a deviation from the permit. KSR therefore requests adding the following language at the beginning of this specific requirement: "Emission limitations associated with this cap are those identified in both Emission Rate Tables (Criteria Pollutants and TAP/HAP & Other Pollutants)."</p> <p>(2) In the modification application text, KSR requested that additional reporting such as this condition be streamlined. In essence, all conditions requiring March 31 reporting of emissions, times, throughputs, and similar records would be compliant with the permit unless otherwise described in the Title V Monitoring, Deviation, and Compliance Certification reports required semiannually and annually. KSR requests that this language be revised to the following in order to consolidate with those reports:</p> <p>"A report of any deviations from the requirements of this condition shall be included in the Annual Compliance Certification and Deviation Report required by March 31 of each year."</p> | <p>(1) The enforceable limits for the cap are already included in the specific requirement.</p> <p>(2) Annual Compliance Certification and Deviation Report shall include all deviations from permit conditions. It's not necessary to add the proposed language to the condition for reporting such deviations.</p> |
| GRP 0009 EQT 0118 | Delete – this dock loads gasoline and vents through EQT089 | According to the application, EQT0118 is for diesel loading operations at this dock. |
| UNF 0001 | | |